## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

AMY KHANG-VANG,

Plaintiff.

Case No. 18-cv-92

v.

WHITELOCKE & ASSOCIATES, LLC and ROBERT FRANKLIN,

Defendants.

## PLAINTIFF'S MOTION TO EXTEND SUMMONS AND TO OPEN DISCOVERY EARLY

Plaintiff, Amy Khang-Vang, moves to extend the summons for Defendant, Robert Franklin, for an additional ninety (90) days pursuant to Fed. R. Civ. P. 4(m). Further, Plaintiff requests that the Court permit her to issue discovery to the telecommunication carriers of Defendant, Whitelocke & Associates LLC ("Whitelocke"), the domain name operator of Whitelocke's website, and the United Parcel Service ("UPS") Store at which Whitelocke's business address is located, for the limited purposes of locating and serving Defendant, Robert Franklin, as well as to ensure that the proper parties have been named. Plaintiff relies on the accompanying brief in support of her motion.

Dated this 10th day of May, 2018.

## HAWKS QUINDEL, S.C.

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